



U.S. Department of Justice

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September 20, 2021

**BY ECF**

Hon. Zahid N. Quraishi  
United States District Judge  
United States District Court  
402 E. State Street  
Trenton, New Jersey  
08608

Re: United States v. State of New Jersey, et al. (21-cv-15031)

Dear Judge Quraishi:

At the request of Monitor Jane Parnell, and pursuant to paragraph 114 of the Settlement Agreement and Consent Decree, *see* ECF No. 12, the parties jointly submit the Monitor's proposed budget to the Court for its approval. Counsel for Defendants has reviewed and consents to this submission to the Court.

Respectfully Submitted,

/s/ Kerry Dean  
Kerry Dean  
Acting Special Counsel  
Special Litigation Section  
Civil Rights Division

/s/ Michael E. Campion  
Michael E. Campion  
Assistant U.S. Attorney  
Chief, Civil Rights Unit  
U.S. Attorney's Office

Enclosure

cc: Matthew Boxer, Esq.  
Rachel Moseson Dikovics, Esq.

## Proposed Monitoring Budget

This is an estimated budget for time and travel costs. All reimbursements for travel will be based on actual costs. The monitor will make every effort to obtain the Federal per diem for hotel rates. Reimbursements for professional fees of \$200 per hour are based on actual hours worked and all invoices will include a detailed account of hours and work provided.

Date/ Monitoring Activity	Site Visits	Site Visit #Hours	Fee-\$200/hour	Work at Home #Hours	Fee-\$200/hour	Supplemental Assistance	Total All Activity Costs
Description	Description	Hours	Total Cost	Hours	Total Cost	Cost	Total
Aug. 2021 -Work at Home- Develop document requests, schedule on-site visits, emails, phone calls, develop budget, review Settlement agreement Est. 12 hours				12	\$2,400.00		\$2,400.00
Sept 21 -Work at Home- Document review (familiarizing myself with NIDOC/Edna Mahan), develop monitoring tools, phone calls, etc. Est. 80 hours/month				80	\$16,000.00		\$16,000.00

October 2021 - two site visits: 4/days/3 nights & 4/days/4nights. Travel Expenses: Airfare: \$800. Hotel: \$1050. Meals \$420.00 Parking/travel to/from airport: \$210.00 Rental Car/gas: \$700.00. Note: will bill actual costs	Days on-site: October 4 - 7 and October 25 - 29	72	\$17,580.00				\$17,580.00
Also in October, 2021 - Work at Home: Reviewing documents/documenting onsite visit				50	\$10,000.00		\$10,000.00
November/December 2021 - Work at home. Document review (continuing to familiarize myself with NIDOC/Edna Mahan), phone calls, emails, compliance assessment. Est. 60 hours/month				120	\$24,000.00		\$24,000.00
January, February, March 2022 - Work at home. Document review, phone calls, emails, compliance assessment. Est. 50 hours/month				150	\$30,000.00		\$30,000.00

April, 2022 - On-site Visit - 6 days/5 nights (including travel). Expenses: Airfare - \$500.00 Hotel: \$750.00 Meals: \$360.00 Parking/Travel to/from Airport: \$180.00, Rental car/gas: \$450.00 Total: \$2240.00 Will bill actual expenses	On Site Visit - 6 days/5 nights	48	\$9,600.00				\$11,840.00
Also in April, 2022 - Work at home - Draft Report Preparation Est 64 hours				64	\$12,800.00		\$12,800.00
May, 2022 - Work at home - Final Report preparation (after receiving comments). Est 32 hours AND document review, phone calls, emails, compliance assessment Est 40 hours. Total hours for May = 72				72	\$14,400.00		\$14,000.00
June & July, 2022 - Work at Home. Work at home. Document review, phone calls, emails, compliance assessment. Est. 50 hours/month				100	\$20,000.00		\$20,000.00
Outside Assistance-Clerical, Other Correctional Consultants, Editor (as needed), Rates vary. Average \$125.00/hour				80	\$16,000.00	\$10,000.00	\$26,000.00
<b>Totals</b>		<b>120</b>	<b>\$27,180.00</b>	<b>648</b>	<b>\$145,600.00</b>	<b>\$10,000.00</b>	<b>\$184,620.00</b>

Approved. So Ordered this 21st day of  
September, 2021.

  
ZAHID NOURAIISHI, U.S.D.J.